

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION**

CHALPIN REALTY SC, LLC, )  
)  
)  
Plaintiff, )  
)  
vs. )  
)  
JERSAM REALTY, INC., )  
)  
Defendant. )

Civil Action No: 4:22-cv-02651-JD

**CONSENT MOTION FOR  
EXTENSION TO RESPOND TO  
PLAINTIFF'S PETITION FOR FEES  
AND MOTION TO AMEND**

Counterclaimant/Defendant, Jersam Realty, Inc., with the consent of Plaintiff, hereby respectfully requests a fourteen-day extension, pursuant to Local Civil Rule 6.01, for the filing of its Response in Opposition to Plaintiffs' Petition for Attorneys' Fees and Costs (DE 35), which would make its response due on November 7, 2023, and Plaintiff's Motion to Amend (DE 36), which would make its response due on November 8, 2023. The Responses are currently due on October 24, 2023 and October 25, 2023. The deadline has not been previously extended, and the requested extension does not affect other deadlines. Counsel makes this request for a fourteen-day extension of time, due to counsels' prior commitments (fall break) and work schedule leading up to the original deadlines (an appellate argument, trial, as well as several hearings).

Pursuant to Local Civil Rule 7.02, the undersigned has spoken with Counsel for Plaintiff to request this extension, and Plaintiff consents to the requested extension. Because this Motion contains a full explanation of the reasons therefor, no supporting memorandum is being submitted pursuant to Local Civil Rule 7.04.

Respectfully Submitted,

**HAYNSWORTH SINKLER BOYD, P.A.**

*s/Stafford J. McQuillin III*

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**AND**

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October 12, 2023